

REMARKS

This is intended as a full and complete response to the Office Action dated July 9, 2004, having a shortened statutory period for response set to expire on October 9, 2004. Please reconsider the claims pending in the application for reasons discussed below.

The drawings stand objected to under 37 CFR 1.84(o). The Examiner states that some of the items, such as 110 and 130, in Figure 1 do not have descriptive labels. Applicants submit that the drawing satisfies the drawing requirements specified under 37 CFR 1.84 and that the descriptive labels are not necessary since the items indicated by the Examiner are clearly described in the specification as host server 110 and network servers 130. Withdrawal of the objection is respectfully requested.

In the specification, the abstract of disclosure stands objected to because, as stated by the Examiner, the abstract "does not describe the subject matter of the dependent claims." Applicants submit that the abstract of the disclosure satisfies the requirements under 37 CFR 1.72 since the abstract reflects a concise statement of the technical disclosure and recites the novel features of the invention. Applicants submit that features recited in the dependent claims are not necessary and respectfully requests withdrawal of the objection.

Claims 1-25 are pending in the application and remain pending following entry of this response. Claims 1-3, 5-8, 10-12, 14-17, 19-21 and 23-25 have been amended to more clearly recite features of the invention. Applicants submit that the amendments do not introduce new matter.

Claims 1-3, 5-12, 14-21 and 23-25 stand rejected under 35 U.S.C. 102(a) as being anticipated by *Padovano* (U.S. Pub. No. 2002/0156984). Applicants respectfully traverse this rejection on grounds that *Padovano* does not disclose all of the features recited in the independent claims. *Padovano* discloses a system and method for accessing a storage area network as a network attached storage utilizing a storage appliance connected between storage devices and hosts/servers. According to *Padovano*, the storage appliance receives read/write requests from the hosts/servers and processes/sends the requests to the applicable storage device. (*Padovano*, paragraph [0090]). However, for embodiments of the invention, as recited in the

independent claims, a device request is processed on a network server system (or a computer in claim 10) to determine the particular device type to which the device request is directed. In contrast, the determination regarding the particular device type to be accessed is not carried out in the component (i.e., "storage appliance" of *Padovano*) to which the storage devices are connected. Thus, *Padovano* does not disclose controlling a plurality of devices connected to a host system in which the determination of the particular device type to which a device request is directed is carried out by a device driver of a network server system, as recited in the independent claims. Furthermore, *Padovano* does not disclose invoking a device driver of the network server system to handle the device request in which the device driver is configured to operate as a single, integrated device driver to support the different device types of the plurality of devices. Therefore, Applicants submit that independent claims 1, 10 and 19, and those depending therefrom, are patentable over *Padovano*.

Claims 4, 13 and 22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Padovano* in view of *Napolitano et al.* (U.S. Patent No. 6,301,605, hereinafter *Napolitano*). The Examiner takes the position that it would have been obvious to one of ordinary skill in the art at the time of the invention to modify *Padovano* in view of *Napolitano* so as to transfer data directly to and from the network server memory. Applicants respectfully traverse this rejection. *Padovano*, as discussed above, does not teach, show or suggest the feature recited in the independent claims. *Napolitano* discloses a file array storage architecture having file system distributed across a data processing platform. The references cited by the Examiner, alone or in combination, do not teach, show or suggest controlling a plurality of devices connected to a host system in which the determination of the particular device type to which a device request is directed is carried out by a device driver of the network server system which is configured to operate as a single, integrated device driver to support the different device types of the plurality of devices, as recited in the independent claims. Therefore, Applicants submit that the references cited by the Examiner do not teach, show or suggest all of the recited features of claims 4, 13 and 22 and that claims 4, 13 and 22 are patentable over *Padovano* in view of *Napolitano*.

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The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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